

CC: TO JUDGE PM

The Honorable Thomas S. Zilly

WJ FILED _____ ENTERED
_____ LODGED _____ RECEIVED

AUG 15 2001 PM



CV 01-01081 #00000009

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

MUIO TRAN, KIM-CUC NGUYEN, NHU
HUU TRAN, a minor child, LOAN HUU
TRAN, a minor child,

Plaintiffs,

v.

THE CITY OF SEATTLE, a local municipal
corporation; PAUL SCHELL, mayor of the
City of Seattle; GIL KERLIOWSKI, Police
Chief of the City of Seattle, KIRK M.
WALDORF, # 6311; ALVIN F. LITTLE, #
4843, JOHN S. VRADENBURG, # 5853;
NICHOLUS J. BAUER, # 5824, ROBERT E.
WHITE, # 5484; ROBERTO V. SABAY, #
5472; EUGENE FOSTER, # 5844;
MICHAEL R. GRIFFIN, # 5875; DANIEL J.
BESTE, # 3295; KENNETH E. HICKS, #
4559; TRUNG H. NGUYEN, # 5999,
ROBERT R. CIERLEY, # 6216; KATHLEEN
A. GRAVES, # 6232; AARON D.
SAUSMAN, # 6089; TODD C. HARRIS, #
6221; JOHNEY STEVENS, # 5072; BRUCE
A. WIND, # 3995, DOUGLAS A. KITTS, #
4744, each individually and each in their
official employment capacity as Seattle
Police Officers,

Defendants.

No. C01-1081-Z

DEFENDANT SEATTLE POLICE
OFFICERS ANSWER TO COMPLAINT

Defendant Seattle Police Officers Kirk M. Waldorf, Alvin F. Little, John S.
Vradenburg, Nicholas J. Bauer, Robert E. White, Roberto V. Sabay, Eugene Foster,

DEFENDANT SEATTLE POLICE OFFICERS
ANSWER TO COMPLAINT - 1

STAFFORD FREY COOPER
Professional Corporation

ATTORNEYS

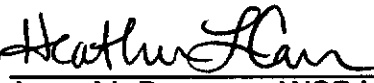
2500 RAINIER TOWER
1301 FIFTH AVENUE
SEATTLE, WASHINGTON 98101-2621
TELEPHONE (206) 623-9900

ORIGINAL

1 Michael R. Griffin, Daniel J. Beste, Kenneth Hicks, Trung H. Nguyen, Robert R. Cierley,
 2 Kathleen A. Graves, Arron D. Sausaman, Todd C. Harris, Johnney Stevens, Bruce A. Wind,
 3 Douglas A. Kitts, and Chief of Police Gil Kerlikowske ("Seattle Police Defendants") answer
 4 by incorporating the answer of the City of Seattle ("the City") and Mayor Schell, filed and
 5 served on July 26, 2001. Seattle Police Defendants further incorporate the affirmative
 6 defenses asserted in the City's and Mayor Schell's answer, especially the defense of
 7 improper service. Plaintiffs have not requested that the officers waive service, nor has
 8 service ever been effected on the officers. Seattle Police Defendants further incorporate
 9 the Prayer for Relief requested in the City's and the Mayor's answer
 10

11
 12 DATED this 15th day of August, 2001.

13 STAFFORD FREY COOPER

14
 15 By 
 16 Anne M. Bremner, WSBA # 13269
 17 Heather L. Carr, WSBA # 29780
 18 Attorneys for Defendants
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DEFENDANT SEATTLE POLICE OFFICERS
 ANSWER TO COMPLAINT - 2

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CERTIFICATE OF SERVICE

The undersigned certifies under the penalty of perjury according to the laws of the United States and the State of Washington that on this date I caused to be served in the manner noted below a copy of this document ***Defendant Seattle Police Officers' Answer to Complaint*** on the following individual:

Salah A. Kornas, Esq
Law Office of Salah A. Kornas
600 First Avenue, Suite 514
Seattle, WA 98104

☒ Via Facsimile
☒ Via Mail
☐ Via Messenger

DATED this 15th day of August, 2001, at Seattle, Washington.



MARY ANN JARBETT

DEFENDANT SEATTLE POLICE OFFICERS
ANSWER TO COMPLAINT - 3

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